

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

WILLIAM R. MILLER, et al.

Case No. 3:17-cv-55

Plaintiff,

JUDGE WALTER H. RICE

v.

MAGISTRATE MICHAEL NEWMAN

U.S. BANK, N.A., et al.

Defendant(s)

**MOTION FOR EXTENSION OF DISCOVERY AND
DISPOSITIVE MOTION DEADLINES**

Plaintiffs, William and Stacy Miller, by and through their undersigned counsel, respectfully request a sixty (60) day extension of time to comply with discovery and dispositive motion deadlines in the within matter.

The Preliminary Pretrial Conference Order (issued on July 10, 2017) provides a cut off deadline for discovery of March 1, 2018. The undersigned counsel was retained on this matter on February 21, 2018. The undersigned would like the opportunity to review all of the existing discovery and take depositions of the Defendant, as well as prepare Plaintiffs to be deposed in a reasonable, timely manner.

Further, Plaintiffs' Motion for Summary Judgment filed on February 9, 2018 [Doc #: 29] will be withdrawn without prejudice.

Said request is not intended for the purpose of delay.

Wherefore, Plaintiffs respectfully request this Honorable Court issue an order granting a sixty (60) day extension of time to the discovery deadlines and dispositive motion deadlines so

that the undersigned can properly and adequately and effectively familiarize himself with the facts of the case.

Respectfully submitted,

/s/ Marc E. Dann

Marc E. Dann (0039425)

Brian Flick (081065)

Michael Smith (097147)

THE DANN LAW FIRM CO., L.P.A.

P.O. Box 6031040

Cleveland, OH 44103

(513) 645-3488

(216) 373-0536 e-fax

notices@dannlaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served electronically by filing in the Court's CM/ECF system on February 22, 2018.

/s/ Marc E. Dann

Marc E. Dann (0039425)

Brian Flick (081065)

Michael Smith (097147)

THE DANN LAW FIRM CO., L.P.A.

Counsel for Plaintiffs